

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

)
)
)
)
)
)
)
)
)

(iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C. § 2256(2)(A)); and

(c) “computer” to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. § 2256(6)).

(d) “child pornography” to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(B) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. § 2256(8)).

2. The “Internet” was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about April 30, 2019, and September 3, 2019, in the Eastern District of Missouri, and elsewhere,

IAN P. MULLIGAN

the Defendant herein, did knowingly distribute and/or receive material that contained image files of child pornography using any means and facility of interstate and foreign commerce, to wit the Defendant knowingly distributed and/or received image files of child pornography via the internet, to include but not limited to the following:

a. A video file entitled “suhot_.avi,” depicting a prepubescent female child with her mouth on

the penis of an adult,

b. An image file entitled "\$ROIFBDF.jpg," depicting a prepubescent male child being anally sodomized by an adult penis,

c. An image file entitled "real lolicon 1 (48).jpg," depicting a prepubescent female child with her mouth on an adult penis,

in violation of Title 18, United States Code, Section 2252A(a)(2).

A TRUE BILL.

FOREPERSON

JEFFREY B JENSEN
United States Attorney

JILLIAN S. ANDERSON, #53918(MO)
Assistant United States Attorney
jillian.anderson@usdoj.gov